

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Section 63.63 Application of)	
AT&T Corp.)	
Pacific Bell Telephone Company)	
SBC Long Distance, LLC)	File No.
Teleport Communications America, LLC)	
)	
For Authority Pursuant to Section 214 of)	
The Communications Act of 1934, As Amended,)	
To Discontinue the Provision of Service)	

SECTION 63.63 APPLICATION OF AT&T

AT&T Services, Inc. on behalf of its affiliates AT&T Corp., Pacific Bell Telephone Company d/b/a AT&T California, SBC Long Distance, LLC d/b/a AT&T Long Distance and Teleport Communications America, LLC, collectively referenced herein as “AT&T”, seeks emergency authorization under Section 214(a) of the Communications Act, as amended (“the Act”), 47 U.S.C. § 214, and Section 63.63 of the Federal Communications Commission’s (“Commission”) rules, to suspend AT&T’s interstate telecommunications services until services can be restored.

As required by Section 63.63(a) of the Commission’s rules, AT&T provides the following information:

(1) The effective date of such discontinuance, reduction, or impairment, and the identification of the service area affected;

AT&T's services were discontinued starting Thursday, November 8, 2018 as the Woolsey and Hill Wildfires ("the Fires") burned in Los Angeles and Ventura Counties in Southern California¹ effecting 4 AT&T Wire Centers.

(2) The nature and estimated duration of the conditions causing the discontinuance, reduction, or impairment;

On November 8, 2018, a brush fire was reported in Woolsey Canyon near the Santa Susana Field Laboratory in the Santa Susana Mountains above the Simi Valley near the boundary between Los Angeles and Ventura counties.² Santa Ana winds caused the fire to spread rapidly, and during the overnight hours into the early morning of November 9, the fire crossed U.S. Route 101 near Calabasas and spread through Liberty Canyon in Agoura Hills.³ On November 8, 2018 Governor Brown proclaimed a State of Emergency for Los Angeles and Ventura Counties.

When the Fire reached 100 percent containment on November 21, 2018, the Fire covered an area of 96,949 acres and destroyed 1,643 structures and 3 civilian fatalities.⁴

¹ "Woolsey Fire General Information." *CAL FIRE. California. November 8, 2018.*

² "Woolsey Fire Incident Update." *Los Angeles County Fire Department, update November 22, 2018*

³ *Haskell, Josh (November 11, 2018). "Woolsey Fire: Forecast calls for high winds in burn area as containment increases to 10 percent." ABC7*

⁴ *Gonzales, Ruby; Cain, Josh (November 14, 2018). "Woolsey fire death toll increases to 3, body found in charred Agoura Hills home." San Gabriel Valley Newspapers. Retrieved November 14, 2018 – via The Mercury News*

AT&T has 5 Central Offices (COs) in the counties affected by the fires. All 5 COs had areas within them that were burned, which includes 138 Distribution Areas (DAs). After assessing these 138 Distribution areas (DA) in the field, 110 DAs were cleared as having no damage to our facilities, 4 DAs were repaired and restored, and 24 DAs incurred damage requiring more complex restoration plans. Of those 24 DAs, service has been restored in 19 DAs. AT&T's Outside Plant Construction and Engineering personnel remain on sight and continue their work to restore service in the remaining 5 DAs.⁵

(3) The facts showing that such conditions could not reasonably have been foreseen by the carrier in sufficient time to prevent such discontinuance, reduction, or impairment;

CAL FIRE, the lead investigation agency, has not determined the official cause of the Woolsey fire and the office cause is still under investigation Southern California Edison (SCE) filed an Electric Safety Incident Reported- Southern California Edison Company Incident No: 181108-9003 with the California Public Utilities Commission on November 8, 2018 indicating that SCE is investigating whether something went wrong at a substation near the fire's ignition point.⁶

⁵ In the event of disasters that prompt the triggering of a disaster recovery plan, the Commission granted AT&T a limited waiver (of up to 180 days) of the advanced notification and waiting period requirements contained in its network disclosure rules (47 C.F.R. §§ 51.325-335) so as to allow AT&T to concentrate on restoration efforts. *See Petition of BellSouth Corporation for Special Temporary Authority and Waiver to Support Disaster Planning and Response, Order*, 21 FCC Rcd 6518 (2006). AT&T has been undertaking emergency restoral activities pursuant to this waiver. Once restoral assessments are completed, AT&T will file the relevant network change notifications associated with network changes that were a direct result of damage to the AT&T network infrastructure caused by the fires.

⁶ Conroy, Steve (December 8, 2018) "SCE Publicly Releases CPUC Submission on the Woolsey Fire" *Business Wire*

(4) A description of the services involved;

AT&T provides numerous residential and business interstate voice, private line, data and video services in this area.⁷

(5) The nature of service which will be available or substituted;

AT&T plans to restore services to all areas it served before the Fires. AT&T is deploying a variety of technologies and configurations in an effort to restore services in an expedited fashion, and is concurrently deploying long-term restoral solutions. AT&T will update the Commission, as needed, if it determines that it will discontinue offering any of its existing services.

(6) The effect upon rates to any person in the community;

AT&T is unaware of any effect this suspension may have upon rates to any person in the community.

(7) The efforts made and to be made by applicant to restore the original service or establish comparable service as expeditiously as possible.

AT&T is restoring its facilities in the areas impacted by the Fires and related events based on location and/or customer access. AT&T has replaced and/or repaired (where possible) existing facilities that served structures that were salvageable.

⁷ See AT&T Corp. Service Publications: AT&T Corp. Tariff F.C.C. No. 2 (Access Services), AT&T Corp. Tariff F.C.C. No. 4 (Business Telecommunications Services), AT&T Business Service Guide, AT&T F.C.C. Tariff No. 3 (AT&T Consumer Services), AT&T Interstate Consumer Service Guides; AT&T California Service Publications: Tariff F.C.C. No. 1 – Access Services, Tariff F.C.C. No. 2 – Special Construction, AT&T Interstate Access Guidebook, AT&T Interstate/IntraLATA Toll Services Guidebook, AT&T Switched Ethernet Service Guide; SBC Long Distance, LLC Service Publications: Tariff F.C.C. No. 18, Tariff F.C.C. No. 19, Voice Product Reference and Pricing Guidebook for Interexchange, Interstate and International Services, Data Product Reference and Pricing Guidebook (Interstate and International Services); Teleport Telecommunications America, LLC Service Publications: AT&T Business Service Guide, Teleport Communications Group Operating Companies Tariff, F.C.C. Tariff No. 2 (Access Services).

Conclusion:

AT&T respectfully requests that the Commission grant AT&T's Section 63.63 Application to suspend AT&T's interstate services where its facilities were damaged in California until these facilities can be rebuilt and services restored as discussed above.

Respectfully submitted,

By: /s/ Terri L. Hoskins

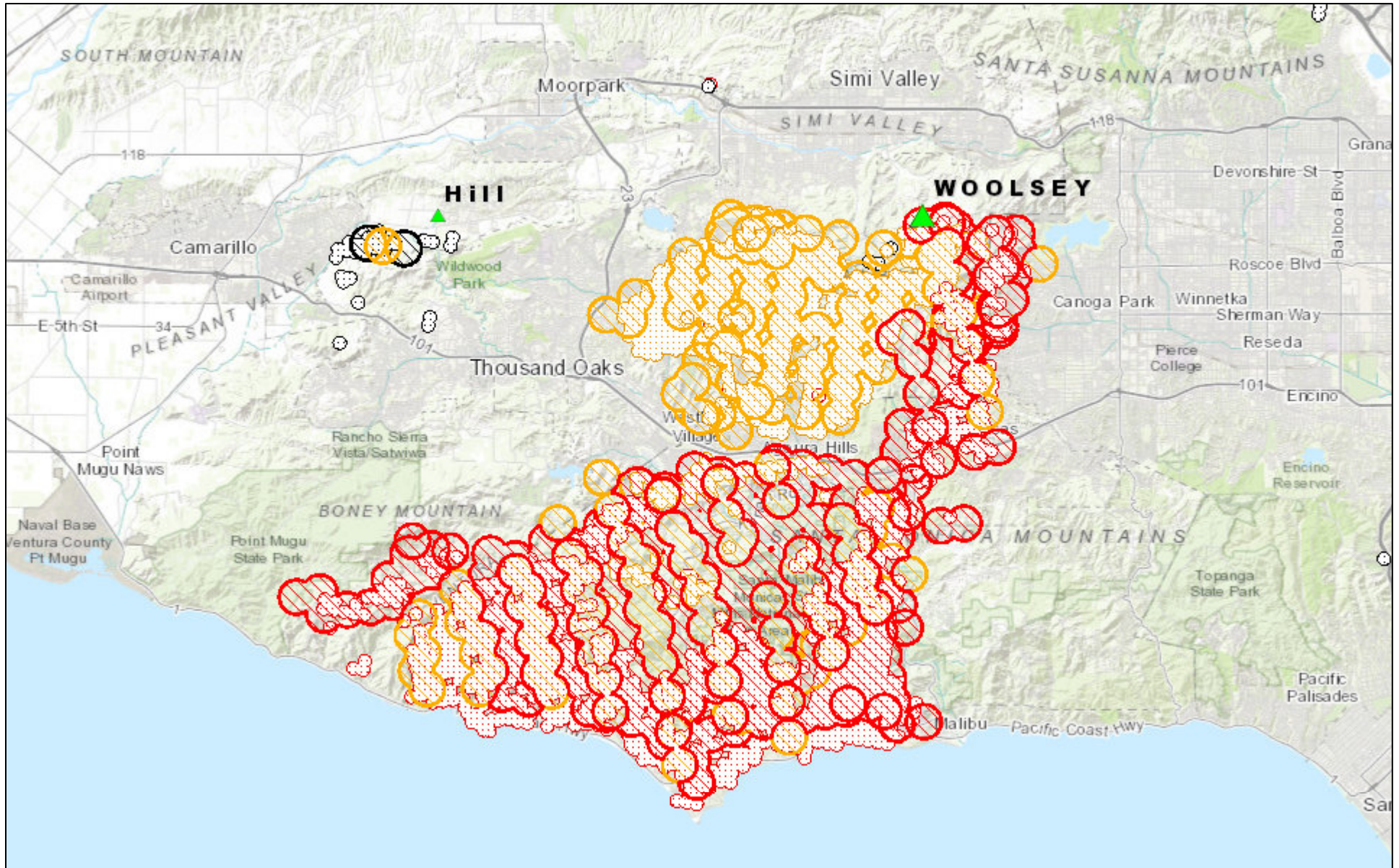
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Its Attorneys

January 10, 2019

ArcGIS Web Map



November 10, 2018

Current Fires

- ▲ Less than 10000 acres
- ▲ 10000 - 24999
- ▲ 25000 - 49999



- 50000 - 99999
- More than 100000

Current Fire Perimeters



- Not Part of Complex

MODIS Fire Detection



- Active Burning



- Part of Complex
- Latest Perimeters

VIIRS IBAND Fire Detection



- Active Burning

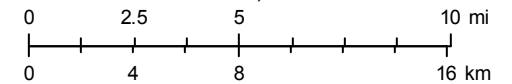


- Last 12-24 hrs
- Last 24-48 hrs



- Last 12-24 hrs
- Last 24-48 hrs

1:288,895



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri

Web AppBuilder for ArcGIS